

EXHIBIT 33

Confidential Attorneys' Eyes Only

<p style="text-align: right;">Page 22</p> <p>1 Gotthelf - CONFIDENTIAL 2 20 times each. 3 A. Perhaps 20 times each? 4 Q. In other words who are you 5 talking about? Who have you heard him 6 curse at? 7 A. I think I've overestimated 8 because I'm trying to put a number on this, 9 and there is no number to be put on it. So 10 20 times -- 11 Q. Well, just tell me who -- 12 A. If the yell number is 20, maybe 13 it's five or so times for each editor on 14 the cursing. I'm just trying to be 15 accurate. 16 Q. No, I appreciate that, but just 17 putting aside the number issue, can you 18 name any editor you have heard Col Allan 19 curse at any number of times? 20 A. Yes. Joe Robinowitz, Frank Zini, 21 Michael Shain, Chris Shaw, sorry, I'm just 22 going through the -- visualizing the 23 newsroom. Rich Wilner, that's pretty much 24 the people. 25 Q. Okay. Tell me how Col Allan</p>	<p style="text-align: right;">Page 23</p> <p>1 Gotthelf - CONFIDENTIAL 2 cursed at you. What did Col Allan say to 3 you that we're talking about, just to make 4 sure we're on the same page? 5 A. Well, he may use an expletive if 6 we're talking about a news story that the 7 Post has missed or as I said before, a fact 8 that I didn't inform him on. He may just 9 curse, like everyday cursing. 10 Q. So give me an example of 11 something he has said to you. 12 A. Something he has said to me, with 13 the expletive in it? 14 Q. I'm sorry, say again? 15 A. With the expletive in it? 16 Q. Yeah, in other words tell me, 17 what's the first curse you remember Col 18 Allan speaking to you. 19 A. Oh, I don't recall. I can give 20 you an example. 21 Q. Well, let's start with that. 22 Give us an example of something he said to 23 you. 24 A. You should have had that fucking 25 story.</p>
<p style="text-align: right;">Page 24</p> <p>1 Gotthelf - CONFIDENTIAL 2 Q. Has he used that phrase with you 3 more than once? 4 A. A handful. 5 Q. Can you remember any other 6 examples of specific curses that Col Allan 7 has used with you? 8 A. I'm sorry, I'm just trying to be 9 accurate. Can you state the question 10 again? 11 Q. Can you think of any other 12 examples of cursing that Col Allan has used 13 in speaking to you? 14 A. He may have used the word, your 15 excuse is bullshit, I've heard him say 16 that. Nothing offensive, just words that 17 come out when you're frustrated. 18 Q. When you say nothing offensive, 19 would you agree that some people could be 20 offended if somebody used the term bullshit 21 talking to them in a conversation? 22 MR. LERNER: Objection. 23 A. I'm not. I can't speak for other 24 people. 25 Q. Do you believe that talking to</p>	<p style="text-align: right;">Page 25</p> <p>1 Gotthelf - CONFIDENTIAL 2 someone using the word bullshit could be 3 offensive to a normal person? 4 MR. LERNER: Objection. 5 A. I can't speak for other people 6 other than myself and I'm not offended by 7 it. 8 Q. Well, you are a journalist, 9 right? 10 A. Yes, exactly. 11 Q. You've spoken to a lot of people 12 in your career, right? 13 A. I have. 14 Q. So when you are out on a beat 15 interviewing just a normal Joe on the 16 street, would you use the word bullshit 17 with that person? 18 MR. LERNER: Objection. 19 A. I might. 20 Q. But you might not? 21 A. And I might not. 22 Q. Why might you not? 23 MR. LERNER: Objection. 24 A. Was it warranted. 25 Q. And you also said he said to you</p>